

## POLICY ON GIFTS AND INVITATIONS TO EMPLOYEES

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### SUMMARY

This policy establishes the guidelines for the acceptance of gifts and invitations by Itaú Chile employees.

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## 1 OBJECTIVE

The purpose of this policy is to prevent situations that may jeopardize the independence and impartiality of Banco Itaú Chile (hereinafter "Itaú", "Banco Itaú" or the "Bank") and its local and international subsidiaries in their decision making and, consequently, that may place personal benefit above that of the general interest. This protects not only Itaú's reputation for conducting business with integrity, but also the personal integrity and prestige of its employees.

## 2 TARGET AUDIENCE

This document is intended for all Itaú employees.

## 3 RESPONSIBILITIES

The document details the responsibilities of the Ethics and Conduct area of AML & Compliance Department and all Itaú employees.

### a) Employees

- Know, understand and comply with the guidelines set forth in this policy.
- Communicate with their manager about gifts and invitations received.

### b) Supervisors

- Encourage compliance with this Code among their teams.
- Communicate to Compliance in a timely manner those instances that require their attention.
- Ensure that business courtesies received by their teams are consistent with the principles set forth in this policy.

### c) Managers

- Obtain information about the invitations and the offeror in order to approve employee participation in appropriate cases.

### d) Compliance

- Disseminate this Policy within Itaú.
- Maintain records in accordance with the provisions of this Policy.
- Respond to inquiries regarding this Policy and provide guidance on the applicable criteria.
- Process and respond to requests for approval of invitations from employees, in conjunction with their agent, where applicable.

## 4 RULES ON GIFTS AND INVITATIONS

### 4.1 RULES ON GIFTS

a) **Concept:** A gift is any material courtesy that can be valued in money, received personally or through third parties (family and relatives), whether or not related to marketing activities (e.g., pens, books, diaries and other low-value items).

b) **Acceptance:** Employees may accept gifts of up to US\$100 after consulting the Compliance Department regarding acceptance. Employees may only receive one gift per year from the same giver.

If the gift is given to a team, the Compliance department will analyze the situation to ensure that the gift does not imply a position with regard to the offeror, counterparty, or customer that could affect our business decisions, offers, etc., with the respective validation of L1.

c) **Prohibition:** Under no circumstances may Itaú employees accept gifts from Public Sector Employees ("PSE"), including Politically Exposed Persons ("PEP"), public officials, holders of public office and members of political parties; if they receive offers of gifts, they must report these situations to Compliance. Please review the Policy on Corruption Prevention.

d) **Other types of gifts:** It is prohibited to accept other types of gifts, such as cash courtesies (money), benefits or favors from customers, suppliers, business partners or other third party, received personally or through third parties (family and relatives).

e) **Return:** Gifts offered that exceed the limits set forth in the preceding paragraphs must be reported by the employee to their supervisor and returned using the standard letter attached hereto as Appendix No.1, signed by the employee or, in the absence of an employee, by the supervisor.

Gifts that cannot be returned, or whose return would cause offense or great discomfort to the giver, will be acknowledged through the standard letter attached as Appendix No.2 to this Policy and will be delivered to Compliance for reporting and delivery as directed by the Senior Ethics and Compliance Committee.

f) **External awards:** Cases in which an employee receives gifts related to their position at Itaú at events not sponsored by Itaú must be approved in writing by the manager of the area involved and by Compliance.

### 4.2 RULES ON INVITATIONS

a) **Concept:** An invitation is any request or communication made personally by a customer, supplier, business partner or other third party to the employee and/or their related parties to attend a meeting or event, either in person or remotely.

**Comentado [PV1]:** La numeración de todo el punto 4 estaba desordenada en el español, se corrigió en inglés.

**Comentado [PV2]:** Las letras b, c, e y f están con mayúsculas en la versión español, lo arreglé en la versión inglés

- b) **Business invitations:** Invitations to lunches, meals or events organized by clients or suppliers may be accepted, provided that they are related to your professional activity at Itaú. These invitations may be accepted as long as the situation does not imply any obligation or influence for Itaú, since it is an activity related to institutional actions.
  
- c) **Technical invitations:** For invitations of a technical nature related to the professional activity performed at Itaú, such as: congresses, lectures or seminars, whether in person or remotely, the employee must request authorization from their management (at least manager level) and Compliance. In this case, all travel, accommodation and expenses must be covered by the employee's management.
  
- d) **Invitations to public officials:** These are invitations extended to PSEs, public officials or members of political parties when they are made in the context of their work and have the necessary authority to accept them within the Bank. In this case, you must notify the Compliance mailbox and adhere to the Policy on Corruption Prevention.
  
- e) **Other invitations:** Invitations to events that are not of a professional nature, such as concerts, sporting events, etc., cannot be accepted unless the employee can demonstrate and justify the importance of their attendance for their professional activity at Itaú, which must be approved by the manager of the employee's area.
  
- f) **Consumption:** For each invitation, the employee must ensure that the cost is reasonable and that the venue is appropriate for the audience. The consumption of alcoholic beverages during meals is permitted, provided that it is done in extreme moderation and that this practice is in accordance with the Internal Rules of Order, Hygiene and Safety of Itaú and other regulations that limit or prohibit it.
  
- g) **Refusal:** In the event that the invitation must be refused, this must be done by means of the letter Appendix No.1 in this policy.

# Policy



## 4.3 GENERAL

- a) **Commitment to Compliance:** All Itaú employees are required to strictly comply with this Policy. Any employee who does not comply with the guidelines of this Policy may be subject to disciplinary action.
  
- b) **Information and inquiries:** All information contained in this Policy that employees are required to provide to the Compliance Department, as well as inquiries regarding the application of this Policy, should be sent to the following e-mail address [Compliance@Itau.cl](mailto:Compliance@Itau.cl).

In the event of detection of any activity carried out by a third party that may be considered contrary to this Policy, the use of the reporting channels established for this purpose is requested.

## 5 RELATED DOCUMENTS

- Code of Ethics and Conduct.
- Corporate Corruption Prevention Policy.
- Itaú's Internal Rules of Order, Hygiene and Safety.





## APPENDIX 1: Thank you letter - returning gift

Text suggestion - Use paper with Itaú logo.

Santiago, [Insert date]

Company: [Insert name of company to which this letter is addressed]

Representative: [Insert the name of the representative of the company to which this letter is addressed]

### **Ref.: Message**

Dear Sir/Madam,

Thank you for sending the gift(s) to our employee(s), which shows your satisfaction with the relationship that currently exists between our companies.

Although we understand that this gesture is accompanied by a positive background, Itaú as a company has internal guidelines, contained in a series of policies as well as in our Code of Ethics, which prevent its employees from receiving such gift(s).

Once again, we express our sincere gratitude for your attention, and we hope you will understand that we cannot accept the gift(s) offered, which we return with this letter.

We take this opportunity to reaffirm our satisfaction in working together to improve our business practices, seeking the exchange of experiences with the primary objective of achieving a continuous improvement of our products and services.

Yours sincerely,

\_\_\_\_\_

Signature of responsible person

Name: [Insert name of responsible person]

Area: [Insert the area of the responsible person]

## **APPENDIX 2: Thank you letter - not returning gift.**



# Policy



Text suggestion - Use paper with Itaú logo

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Yours sincerely,

\_\_\_\_\_  
Signature of responsible person

Name: [Insert name of responsible person]

Area: [Insert the area of the responsible person]

